

REMARKS

Claims 1-24 are pending. Claims 1-24 stand rejected under 35 U.S.C. §101. The Examiner then rejected claims 1-24 under 35 U.S.C. §102(e) as being anticipated by Kasravi (U.S. Pub. No. 2004/0249829). The Examiner also indicated that copies of the non-patent references cited in the Information Disclosure Statement (IDS) filed with the application on March 12, 2004 were not provided with the IDS submission and, as such, were not considered.

A Supplemental IDS including copies of the non-patent references originally cited with the IDS filed on March 12, 2004 is being cited under separate cover.

The Examiner rejected claims 1-24 under 35 U.S.C. §101 as being directed to non-statutory subject matter. Specifically, the Examiner asserted that the "computer system must set forth a practical application of § 101 judicial exception to produce a real-world result." OFFICE ACTION, August 22, 2006, p. 3. The Examiner then concluded that "[t]he invention is ineligible because it has not been limited to a substantial practical application." OFFICE ACTION, August 22, 2006, p. 3.

Section 101 of Title 35 of the U.S. Code provides:

Whoever invents or discovers any new and useful process, machine, manufacture, or composition of matter, or any new and useful improvement thereof, may obtain a patent therefor, subject to the conditions and requirements of this title.

Therefore, the first inquiry in determining whether a claimed invention is patentable is to determine if the invention as claimed falls within one of the four enumerated categories identified in 35 U.S.C. §101; namely, process, machine, manufacture, or composition of matter. If the claimed invention does fall within any of those enumerated categories, then an inquiry must be made to determine if the claimed invention is directed to a judicial exception to patented subject matter. The "practical application" analysis is inapplicable if the claimed invention falls within the enumerated categories and is not directed to an abstract idea, laws of nature, or natural phenomenon. That is, if a claimed invention falls within the enumerated categories but is directed to a judicial exception, it may still be patentable if the claimed invention is a practical application of an abstract idea, law of nature, or natural phenomenon. See *Diamond v. Diehr*, 450 U.S. 175, 185 (1981).

In the present application, claims 1-17 are directed to a method of information management for semiconductor manufacturing and claims 18-24 are directed to a system for managing semiconductor manufacturing information. The management of semiconductor manufacturing information is not a law of nature or a natural phenomenon. Moreover, such information management is not an abstract idea. That is, claims 1-24 are not seeking to claim information management in general but a unique information management system and method applicable for semiconductor manufacturing information. As such, the

claimed invention does not seek to cover every substantial practical application of information management. As such, it is believed that claims 1-24 are directed to statutory subject matter as defined by 35 U.S.C. §101.

The Examiner also rejected claims 1-24 as being anticipated by Kasravi. There are numerous patentable distinctions between that claimed and that disclosed by Kasravi. For example, Kasravi fails to disclose a method for managing semiconductor manufacturing knowledge that includes "defining a hierarchy of interests in the semiconductor knowledge with data targets and results." The Examiner has asserted that the link diagram of Fig. 2 of Kasravi describes the claimed hierarchy of interests. However, the link diagram does not provide a hierarchy of interests. The link diagram shows the relationships between various informational objects. The relationship between the objects does not involve the ranking of the objects. In fact, Kasravi teaches that the purpose of the link diagram is to illustrate the various relationships between otherwise un-related objects, not to rank the objects. As such, the reference fails to teach or suggest that recited in the pending claims.

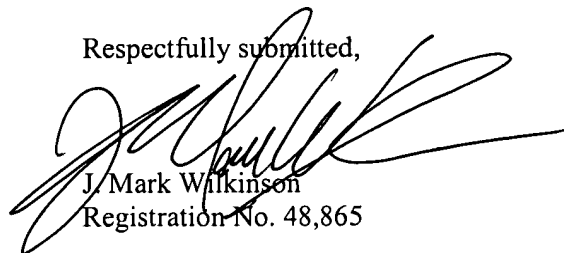
Moreover, Applicant requests consideration of the enclosed antedating declaration showing prior conception of the claimed invention.

Accordingly, the rejection of claims 1-24 based on Kasravi cannot be sustained and therefore should be withdrawn.

As no other issues remain outstanding, Applicant requests timely issuance of a Notice of Allowance for claims 1-24.

Please grant any extension of time required to enter this Amendment and charge any additional required fees to Deposit Account No. 08-1394.

Respectfully submitted,



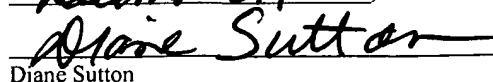
J. Mark Wilkinson
Registration No. 48,865

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HAYNES AND BOONE, LLP
901 Main Street, Suite 3100
Dallas, Texas 75202-3789
Telephone: 972/739-6927
Facsimile: 214/200-0853
Attorney Docket No.: 2003-0191/24061.60
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Diane Sutton